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10 *Google Inc.*

11
12 **UNITED STATES DISTRICT COURT**
13 **NORTHERN DISTRICT OF CALIFORNIA**
14 **SAN JOSE DIVISION**

15 IN RE: HIGH-TECH EMPLOYEE
ANTITRUST LITIGATION

16 THIS DOCUMENT RELATES TO:
17 ALL ACTIONS

Master Docket No. 11-CV-2509-LHK

**DECLARATION OF ANNE M. SELIN
IN SUPPORT OF DEFENDANT
GOOGLE INC.'S MOTION FOR
SUMMARY JUDGMENT**

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21 I, Anne M. Selin, declare as follows:

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23 1. I am an attorney with the law firm of Mayer Brown LLP, counsel for Defendant
24 Google, Inc. ("Google") in the above-captioned matter. I am admitted to practice law before this
25 Court. I submit this declaration in support of Defendant Google's Motion for Summary
26 Judgment that is being filed concurrently herewith. As an attorney involved in the defense of
27 this action, unless otherwise stated, I have personal knowledge of the facts stated in this
28 declaration and if called as a witness, I could and would competently testify to them.

Deposition Testimony

2. Attached hereto as Exhibit 1 is a true and correct copy of transcript excerpts from the deposition testimony of Arnon Geshuri.

3. Attached hereto as Exhibit 2 is a true and correct copy of transcript excerpts from the deposition testimony of Laszlo Bock.

4. Attached hereto as Exhibit 3 is a true and correct copy of transcript excerpts from the deposition testimony of Frank Wagner.

5. Attached hereto as Exhibit 4 is a true and correct copy of transcript excerpts from the deposition testimony of Shona Brown.

6. Attached hereto as Exhibit 5 is a true and correct copy of transcript excerpts from the deposition testimony of Omid Kordestani.

7. Attached hereto as Exhibit 6 is a true and correct copy of transcript excerpts from the deposition testimony of Eric Schmidt.

8. Attached hereto as Exhibit 7 is a true and correct copy of transcript excerpts from the deposition testimony of Sergey Brin.

9. Attached hereto as Exhibit 8 is a true and correct copy of transcript excerpts from the deposition testimony of Paul Otellini.

10. Attached hereto as Exhibit 9 is a true and correct copy of transcript excerpts from the deposition testimony of William Campbell.

11. Attached hereto as Exhibit 10 is a true and correct copy of transcript excerpts from the deposition testimony of Alan Eustace.

12. Attached hereto as Exhibit 11 is a true and correct copy of transcript excerpts from the deposition testimony of Larry Page.

13. Attached hereto as Exhibit 12 is a true and correct copy of transcript excerpts from the deposition testimony of Plaintiff Siddharth Hariharan.

14. Attached hereto as Exhibit 13 is a true and correct copy of transcript excerpts from the deposition testimony of Matthew Marx.

1 15. Attached hereto as Exhibit 14 is a true and correct copy of transcript excerpts
2 from the deposition testimony of Edward Leamer.

3 **Documents**

4 16. Attached hereto as Exhibit 15 is a true and correct copy of the document produced
5 by Google with Bates number GOOG-HIGH-TECH-00433305.

6 17. Attached hereto as Exhibit 16 is a true and correct copy of the document produced
7 by Google with Bates number GOOG-HIGH-TECH-00258494.

8 18. Attached hereto as Exhibit 17 is a true and correct copy of the document produced
9 by Google with Bates number GOOG-HIGH-TECH-00223682.R.

10 19. Attached hereto as Exhibit 18 is a true and correct copy of the document produced
11 by Google with Bates number GOOG-HIGH-TECH-00024150.

12 20. Attached hereto as Exhibit 19 is a true and correct copy of the document produced
13 by Google with Bates number GOOG-HIGH-TECH-00193360.R.

14 21. Attached hereto as Exhibit 20 is a true and correct copy of the document produced
15 by Google with Bates number GOOG-HIGH-TECH-00061040.

16 22. Attached hereto as Exhibit 21 is a true and correct copy of the document produced
17 by Google with Bates number GOOG-HIGH-TECH-00007635.

18 23. Attached hereto as Exhibit 22 is a true and correct copy of the document produced
19 by Google with Bates number GOOG-HIGH-TECH-00008283.

20 24. Attached hereto as Exhibit 23 is a true and correct copy of the document produced
21 by Google with Bates number GOOG-HIGH-TECH-00235168.

22 25. Attached hereto as Exhibit 24 is a true and correct copy of the document produced
23 by Google with Bates number GOOG-HIGH-TECH-00009764.

24 26. Attached hereto as Exhibit 25 is a true and correct copy of the document produced
25 by Google with Bates number GOOG-HIGH-TECH-00056885.

26 27. Attached hereto as Exhibit 26 is a true and correct copy of the document produced
27 by Google with Bates number GOOG-HIGH-TECH-00008342.

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28. Attached hereto as Exhibit 27 is a true and correct copy of the document produced by Google with Bates number GOOG-HIGH-TECH-00023106.

29. Attached hereto as Exhibit 28 is a true and correct copy of the document produced by Google with Bates number GOOG-HIGH-TECH-00023299.

30. Attached hereto as Exhibit 29 is a true and correct copy of the document produced by Google with Bates number GOOG-HIGH-TECH-00057127.

31. Attached hereto as Exhibit 30 is a true and correct copy of the document produced by Google with Bates number GOOG-HIGH-TECH-00059291

32. Attached hereto as Exhibit 31 is a true and correct copy of the document produced by Google with Bates number LUCAS00070675.

33. Attached hereto as Exhibit 32 is a true and correct copy of the document produced by Google with Bates number LUCAS00195586.

Exhibits from Expert Reports

34. Attached hereto as Exhibit 33 is a true and correct copy of Exhibit 2B of the Expert Report of Professor Kevin M. Murphy dated November 12, 2012.

35. Attached hereto as Exhibit 34 is a true and correct copy of excerpts of Exhibit IV.1 of the Expert Report of Lauren J. Stiroh, Ph.D.

36. Attached hereto as Exhibit 35 is a true and correct copy of Appendix 1A of the Expert Report of Professor Kevin M. Murphy dated November 12, 2012.

37. Attached hereto as Exhibit 36 is a true and correct copy of Appendix 1B of the Expert Report of Professor Kevin M. Murphy dated November 12, 2012.

Interrogatory Responses

38. Attached hereto as Exhibit 37 is a true and correct copy of Plaintiffs' Supplemental Answers and Objections to Defendants' Second Set of Interrogatories

39. Attached hereto as Exhibit 38 is a true and correct copy of Plaintiffs' Answers and Objections to Defendants' Second Set of Interrogatories, Number 16.

1 I declare under penalty of perjury under the laws of the United States that the foregoing is
2 true and correct.

3 Executed on January 9, 2014 in Palo Alto, California.

/s/ Anne M. Selin

Anne M. Selin